

MDL 1570 PLAINTIFFS' EXECUTIVE COMMITTEES

In re: Terrorist Attacks on September 11, 2001 (S.D.N.Y.)

Plaintiffs' Executive Committee for Personal Injury and Death Claims	Plaintiffs' Executive Committee for Commercial Claims
Ronald L. Motley (1944-2013) Jodi Westbrook Flowers / Donald A. Migliori, <i>Co-Chairs</i> MOTLEY RICE LLC James P. Kreindler, <i>Co-Chair</i> KREINDLER & KREINDLER LLP	Stephen A. Cozen, <i>Co-Chair</i> Sean Carter, <i>Co-Chair</i> COZEN O'CONNOR
Andrew J. Maloney III, <i>Co-Liaison Counsel</i> KREINDLER & KREINDLER LLP Robert T. Haeefe, <i>Co-Liaison Counsel</i> MOTLEY RICE LLC	J. Scott Tarbutton, <i>Liaison Counsel</i> COZEN O'CONNOR

VIA ECF

September 15, 2020

The Honorable Sarah Netburn, U.S. Magistrate Judge
United States District Court for the S.D.N.Y.
Thurgood Marshall U.S. Courthouse, Room 430
40 Foley Square
New York, NY 10007

Re: *In Re: Terrorist Attacks on September 11, 2001*, 03 MDL 1570 (GBD) (SN)

Dear Judge Netburn:

The Plaintiffs' Executive Committees respectfully move for an additional extension of three business days, from September 17, 2020 to September 22, 2020, for the parties to present their joint or separate proposals to the Court as set forth in this Court's August 27, 2020 Order (ECF No. 6408). On September 4, 2020, the PECs requested an extension of that deadline from September 10 to September 17, ECF No. 6424, which the Court granted (ECF No. 6424). The Kingdom of Saudi Arabia has advised that it does not object to the requested three-day extension.

Plaintiffs need the additional three days to allow the PECs to complete ongoing consultations and to confer in good faith with counsel for the Kingdom, with the benefit of additional information just received. We had previously indicated to counsel for the Kingdom that, to be able to confer, we needed the Kingdom's responses to inquiries the PECs submitted on September 1. We received the Kingdom's responses yesterday (September 14). In addition, the PECs have been consulting with several third parties in relation to their proposal, and those conversations are not yet complete.

For the foregoing reasons, Plaintiffs respectfully request that the Court extend the deadline for the parties' joint or separate proposals by three additional business days, to September 22, 2020.

Respectfully submitted,

MOTLEY RICE LLC

COZEN O'CONNOR

By: /s/ Robert T. HaeefeBy: /s/ Sean P. Carter

The Honorable Sarah Netburn
September 15, 2020
Page 2

ROBERT T. HAEFELE
MOTLEY RICE LLC
28 Bridgeside Boulevard
Mount Pleasant, SC 29465
Tel.: (843) 216-9184
Email: rhaefele@motleyrice.com
For the Plaintiffs' Exec. Committees

SEAN P. CARTER
COZEN O'CONNOR
One Liberty Place
1650 Market Street, Suite 2800
Philadelphia, Pennsylvania 19103
Tel.: (215) 665-2105
Email: scarter@cozen.com
For the Plaintiffs' Exec. Committees

KREINDLER & KREINDLER LLP

By: /s/ Andrew J. Maloney
ANDREW J. MALONEY
KREINDLER & KREINDLER LLP
750 Third Avenue
New York, New York 10017
Tel.: 212-687-8181
Email: amaloney@kreindler.com
For the Plaintiffs' Exec. Committees

cc: The Honorable George B. Daniels, via ECF
All Counsel of Record via ECF